

## KENT/McBRIDE

1715 Highway 35, Suite 305  
Middletown, NJ. 07748  
Phone: 732 326 1711  
Fax: 732 326 1830  
www.kentmcbride.com

Christopher D. Devanny, Esq.  
Direct Dial: 732 781 1307  
[cdevanny@kentmcbride.com](mailto:cdevanny@kentmcbride.com)

March 30, 2018

**Filed Electronically**

The Honorable Freda L. Wolfson  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Bldg. & Courthouse  
402 East State Street  
Trenton, New Jersey 08608

**RE: Cunningham v. Capital Advance Solutions, et al.  
Civil Action No. 3:17-cv-13050 (FLW) (DEA)**

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Dear Judge Wolfson:

The undersigned represents defendants Capital Advance Solutions, Geoffrey Horn, Charles Betta and Daniel Logan in regard to the above-referenced matter.

Plaintiff filed a Complaint on December 13, 2017. On January 2, 2018, my office filed an Answer to plaintiff's complaint on behalf of Capital Advance Solutions, Geoffrey Horn, Charles Betta and Daniel Logan. On February 6, 2018, my office filed a Motion for Judgment on the Pleadings. On March 20, 2018, plaintiff filed a Response in Opposition to our Motion for Judgment on the Pleadings. Subsequently, on March 29, 2018, plaintiff filed an Amended Complaint.

Our Motion for Judgment on the Pleadings is still pending. Rather than burden the Court with an additional round of motion practice, defendants Capital Advance Solutions, Geoffrey Horn, Charles Betta and Daniel Logan respectfully request the Court permit defendants to respond to plaintiff's Amended Complaint within their Reply to plaintiff's Response in Opposition to defendants' Motion for Judgment on the Pleadings.

Furthermore, defendants Capital Advance Solutions, Geoffrey Horn, Charles Betta and Daniel Logan respectfully request the Court permit defendants to answer plaintiff's Amended Complaint, if an answer be required, after the Court decides defendants' Motion for Judgment on the Pleadings.

Thank you for your courtesy in this matter. Please do not hesitate to contact the undersigned with any questions or concerns.

Respectfully,



Christopher D. Devanny, Esq. #3719